

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

M² CONSULTING, INC.,

Plaintiff,

v.

MRO SOFTWARE, INC.,

Defendant.

Civil Action No. 03-12589-GAO

JOINT MOTION TO MODIFY SCHEDULING ORDER

The parties submit this Joint Motion to Modify the Scheduling Order in this matter as follows:

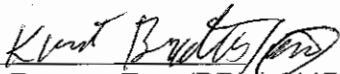
- Change the existing August 31, 2005 deadline for the completion of fact discovery, to October 31, 2005;
- Move the deadline for M2's expert report to November 30, 2005;
- Modify the deadline for MRO's expert report to December 31, 2006; and
- Change the deadline for the completion of all expert witness depositions to January 31, 2006.

As ground for this motion, the parties state as follows:

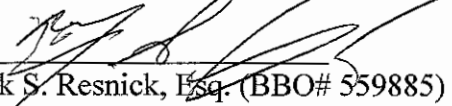
1. Fact discovery in this matter is scheduled to conclude on August 31, 2005.
2. This case has evolved significantly since the Court's most recent Scheduling Order was entered. The Defendant, MRO Software, Inc. ("MRO") has amended its counterclaims, and the Plaintiff, M2 Consulting, Inc. ("M2") will shortly be amending its complaint.

3. Following the resolution of certain motions by the Court, the Magistrate's Report has raised the possibility of one of the parties conducting discovery into certain fact areas associated with that motion. The Court has not yet entered an order formally adopting the Magistrate's Report.
4. To date, the parties have taken two depositions in this case and are currently attempting to resolve a number of discovery disputes.
5. The parties are also discussing the possibility of engaging in mediation.
6. Accordingly, the Court should extend the deadline for the conclusion of fact discovery and modify the other Scheduling Order deadlines as necessary.

MRO Software, Inc.
By its Attorneys
Gesmer Updegrove LLP

By: 
Kurt Bratten, Esq. (BB)# 644730
Gesmer Updegrove LLP
40 Broad Street
Boston, MA 02109
(617) 350-6800

M2 Consulting, Inc.
By its Attorneys
Fee, Rosse & Lanz, P.C.

By: 
Mark S. Resnick, Esq. (BBO# 559885)
Fee, Rosse & Lanz, P.C.
321 Boston Post Road
Sudbury, MA 01776
(978) 440-7000

August 26, 2005